

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OHIO ORGANIZING COLLABORATIVE;
JORDAN ISERN; CAROL BIEHLE; and
BRUCE BUTCHER

Plaintiffs,

v.

JON HUSTED, in his official capacity as
Secretary of State of the State of Ohio; and
MIKE DEWINE, in his official capacity as
Attorney General of the State of Ohio,

Defendants.

Case No. 2:15 CV 1802

MAGISTRATE JUDGE WATSON

MAGISTRATE JUDGE KING

**MOTION TO SUBSTITUTE PLAINTIFF OHIO ORGANIZING COLLABORATIVE
PURSUANT TO RULE 21 AND TO AMEND COMPLAINT PURSUANT TO RULE 15**

NOW COMES, Plaintiff Ohio Organizing Collaborative, who by and through its undersigned counsel, hereby moves pursuant to Federal Rules of Civil Procedure 15 and 21 to withdraw from the above-captioned suit and to substitute the following parties as plaintiffs: 1) the Ohio Democratic Party; 2) the Democratic Party of Cuyahoga County; and 3) the Montgomery County Democratic Party. Plaintiffs also move pursuant to Rule 15 to amend the complaint to reflect the change in parties as well as to drop their claims that overlap with those in the Supplemental Complaint Judge Marbley recently permitted to proceed in his August 7, 2015 Order in *The Northeast Ohio Coalition for the Homeless, et al., v. Husted, et al.*, No. 2:06-CV-00896 (S.D. Ohio) (Dkt. 452 Aug. 7, 2015). The details of these changes are set forth in the proposed Amended Complaint attached hereto as Exhibit 1, and in the separately filed Memorandum of Support, which is expressly incorporated into this Motion.¹

¹ Pursuant to Local Rule 7.3, Plaintiffs' counsel sought consent from Defendants' counsel to amend the complaint to substitute the parties and drop the overlapping claims. Defendants' counsel refused

Dated: August 13, 2015

Respectfully submitted,

/s/ Donald J. McTigue

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Attorneys for Plaintiffs The Ohio Organizing
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Bruce Butcher

*Admitted *Pro Hac Vice*

that request.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed with the United States District Court, Southern District of Ohio, on August 13, 2015, and served upon all parties of record via the court's electronic filing system.

By: /s/ Donald J. McTigue
DONALD J. MCTIGUE (0022849)